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17 **UNITED STATES BANKRUPTCY COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 In Re:
21 PG&E CORPORATION
22 and
23 PACIFIC GAS & ELECTRIC COMPANY,
24 Debtors.
25
26
27
28

Bankr. Case No. 19-30088-DM
**SECOND NOTICE OF VOTING
PROCEDURE IRREGULARITIES**

1 This notice of procedural irregularities in the ongoing process of the fire victims
2 voting on PG&E's proposed plan is filed by the undersigned counsel for many (1,021)
3 persons and businesses harmed by the Atlas (Napa), Redwood Valley (Mendocino), and
4 Camp (Paradise) fires.
5

6 On May 5, 2020, the undersigned filed in this Court a Notice of Plan Voting
7 Procedure Irregularities, with ten exhibits, setting forth six different ways law firms
8 favoring acceptance of the plan made it harder for their clients to vote to reject the plan and
9 identifying problems of missing, late, and duplicate ballots. (Doc. 7069)
10

11 Since then, two additional devices have come to our attention by which attorneys
12 favoring acceptance of the plan made it harder for fire victims to vote to reject the plan.
13

- 14 • A law firm voting to accept the plan without its client's knowledge or consent
15 and contrary to the client's desire to vote to reject (Exhibit 1),
- 16 • A law firm requiring its clients to contact the firm if they wanted to vote to
17 reject the plan and then attempting to convince the clients to change their
18 vote to "accept" (Exhibit 2).
19

20 The first notice of procedural irregularities provided examples of missing, late, and
21 duplicate ballots. This notice supplements these problems with additional irregularities
22 noted by fire victims on letters and applications to the Court and on social media
23 platforms, including:
24

- 25 • Fire victims not receiving solicitation materials, including ballots, at all
26 (Application of Ms. Wallace, 5/11/20, Doc. 71410; Exhibit 3),
- 27 • Solicitation materials not received by fire victims until the end of April 2020
28 (Exhibit 4),

- Solicitation packages sent to fire victims with cover letters from the wrong attorneys (Exhibit 5), and
- Much suspicion and distrust by fire victims of the Master Ballot system by which attorneys solicit, receive, and report votes of their clients (examples Exhibits 6, 7, 8).

These materials are provided to the Court for its information and made part of the record of this case.

Dated: May 13, 2020

/s/ Thomas Tosdal
Attorney